

REMARKS

Claims 97-115 remain pending in this application.

Claims 97-115 have been provisionally rejected on the grounds of non-statutory double patenting over claims 61-91 of copending application U.S. Serial No. 11/115,732.

While not concurring with the rejection, but to expedite prosecution, a terminal disclaimer has been filed concurrently with this response. Accordingly, withdrawal of the non-statutory double patenting rejection in view of U.S. Serial No. 11/115,732 is respectfully requested.

Claims 97-115 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Cohn et al. (U.S. Patent No. 6,411,684; hereinafter Cohn) in view of Archer (U.S. Patent No. 6,683,870). The rejection is respectfully traversed.

As to claim 97, the Office Action states that Cohn discloses each of the features of claim 97 and generally points to Figs. 1-3, 6, 10 and 13; col. 4, line 13 to col. 5, line 35; col. 18, lines 23-60; and col.19, line 18 to col. 20, line 50 (Office Action – pages 4-5). The applicants note that the rejection is based on the combination of Cohn and Archer and it is not clear which features the Office Action admits that Cohn does not disclose. The applicants assume that the Office Action admits that Cohn does not disclose at least one dispatch server for communication with a secure web server and a plurality of system resources, where the plurality of system resources include a network manager which manages routing of the customer's traffic over the communications network, and a view application to review network traffic, said network manager and said view application responsive to proxy requests from said dispatch server to enable the customer to command and control switched voice traffic resources and switched data traffic resources provided by the enterprise to the customer, as recited in claim 1, since the Office Action states that

Archer discloses these features. However, clarification is respectfully requested in any subsequent communication.

In any event, the applicants point to the arguments submitted in the response filed February 6, 2007 particularly rebutting the alleged teachings of Cohn with respect to the features discussed above.

The Office Action states that Archer discloses a plurality of system resources including a network manager which manages routing of the customer's traffic over the communications network, and a view application to review network traffic, the network manager and the view application responsive to proxy requests from the dispatch server to enable the customer to command and control switched voice traffic resources and switched data traffic resources provided by the enterprise to the customer and points to col. 4, lines 17-51 of Archer for support (Office Action – page 5).

Archer is directed to a method and system for multicasting call notifications (Archer – col. 1, lines 12-15). Archer at col. 4, lines 17-51 discloses that system 110 handles Internet protocol (IP) based voice traffic. More particularly, this portion of Archer discloses that system 110 converts calls from analog signals to digital signals, splits up the call into IP packets, routes the packets to their destination and reassembles the IP packets. This portion of Archer also discloses that when an end user dials a single find-me number, the IP packets are routed to a packet-switched network where components within the network receive the header and search for a telephone number at which the person being called will answer (Archer – col. 4, lines 17-30). This portion of Archer further discloses a specific example in which a user places a call which is routed to a special converter which converts the receiving phone number into digital packets. The packets are routed to a computer system where the receiving phone number is extracted. The computer system queries a database

with the phone number, returns all the numbers in the called party's record, assembles each of the phone numbers into digital packets and routes the packets to converters which return the call notifications to the ordinary phone system. (Archer – col. 4, lines 31-51).

These portions of Archer do not disclose or suggest a plurality of system resources including a network manager and a view application to review network traffic, where the network manager and view application are responsive to proxy requests from a dispatch server to enable the customer to command and control switched voice traffic resources and switched data traffic resources provided by the enterprise to the customer, as recited in claim 97. In contrast, these portions of Archer merely disclose routing call notifications to a user's phone system.

Therefore, the combination of Cohn and Archer does not disclose or suggest each of the features of claim 97. Accordingly, withdrawal of the rejection and allowance of claim 97 are respectfully requested.

Claims 98-109 are dependent on claim 97 and are believed to be allowable for at least the reasons claim 97 is allowable. In addition, these claims recite additional features not disclosed or suggested by the combination of Cohn and Archer.

For example, claim 98 recites that the switched voice traffic resources include switched toll free voice traffic resources and said network manager includes a toll free network manager application responsive to proxy requests from said dispatch server to enable the customer to command and control routing of switched toll free voice traffic.

The Office Action points to the same portions of Cohn noted above as allegedly disclosing the features of claim 98 (Office Action – page 5). As discussed in the previous response filed February 6, 2007, the portions of Cohn noted in the Office Action do not disclose a toll free network manager application responsive to proxy requests from a

dispatch server to enable the customer to command and control routing of switched toll free voice traffic, as required by amended claim 98. In fact, Cohn does not even mention switched toll free voice traffic. Archer also does not disclose or suggest these features.

Claim 100 recites that the network manager includes an outbound network manager responsive to proxy requests from said dispatch server to enable the customer to command and control switched toll traffic. The Office Action points to the same portions of Cohn noted above as allegedly disclosing the features of claim 100 (Office Action – page 6). As discussed in the previous response and similar to the discussion above with respect to claim 98, Cohn does not mention switched toll traffic, much less a network manager responsive to proxy requests from a dispatch server to enable the customer to command and control switched toll traffic, as required by claim 100. Archer also does not disclose or suggest these features.

For at least these additional reasons, withdrawal of the rejection and allowance of claims 98 and 100 are respectfully requested.

Claim 99 recites that the switched voice traffic resources include switched call center voice traffic resources and said network manager includes a call manager application responsive to proxy requests from said dispatch server to enable the customer to command and control routing of switched voice traffic between call centers.

The Office Action points to the same portions of Cohn discussed above (i.e., Figs. 1-3, 6, 10 and 13 along with col. 4, line 13 to col. 5, line 35, col. 18, lines 23-60, col. 19, line 18 to col. 20, line 50) as allegedly disclosing the features of claim 99 (Office Action – page 6). These portions of Cohn have been discussed in the previous response with respect to these features. None of these portions of Cohn, or any other portions of Cohn, even mentions call centers, much less a call manager application responsive to proxy requests

form a dispatch server to enable the customer to command and control the routing of switched voice traffic between call centers, as required by amended claim 99. Archer also does not disclose or suggest these features.

For at least these reasons, the combination of Cohn and Archer does not disclose or suggest each of the features of claim 99. Accordingly, withdrawal of the rejection and allowance of claim 99 are respectfully requested.

As to claim 110, the Office Action states that Cohn discloses each of the features of claim 110 and generally points to Figs. 1-3, 6, 10 and 13; col. 4, line 13 to col. 5, line 35; col. 18, lines 23-60; and col.19, line 18 to col. 20, line 50 (Office Action – page 9). Similar to the discussion above with respect to claim 97, it is not clear which features the Office Action admits that Cohn does not disclose. The applicants assume that the Office Action admits that Cohn does not disclose that said plurality of system resources including a toll free network manager which manages routing of the customer's toll free voice traffic over the communications network, and a real time monitor which provides near real time monitoring of network traffic, said toll free network manager and said real time monitor responsive to proxy requests from said dispatch server to enable the customer to manage the communications network resources provided by the enterprise to the customer in near real time, as recited in claim 110, since the Office Action states that Archer discloses these features. However, clarification is respectfully requested in any subsequent communication. The applicants also point to the arguments submitted in the response filed February 6, 2007 particularly rebutting the alleged teachings of Cohn with respect to the features recited in claim 110.

The Office Action states that Archer discloses that the plurality of system resources include a toll free network manager which manages routing of the customer's toll free voice

traffic over the communications network, and a real time monitor which provides near real time monitoring of network traffic, the toll free network manager and the real time monitor responsive to proxy requests from the dispatch server to enable the customer to manage the communications network resources provided by the enterprise to the customer in near real time and points to col. 4, lines 17-51 for support (Office Action – pages 9-10). The applicants respectfully disagree.

Archer at col. 4, lines 17-51, as discussed above, merely disclose using IP to route call notifications to a user's phone system. Archer does not disclose or suggest a plurality of system resources that include a toll free network manager which manages routing of the customer's toll free voice traffic over the communications network, and a real time monitor which provides near real time monitoring of network traffic, much less that the toll free network manager and the real time monitor are responsive to proxy requests from said dispatch server to enable the customer to manage the communications network resources provided by the enterprise to the customer in near real time, as required by claim 110.

For at least these reasons, the combination of Cohn and Archer does not disclose or suggest each of the features of claim 110. Accordingly, withdrawal of the rejection and allowance of claim 110 are respectfully requested.

Claims 111-114 are dependent on claim 110 and are believed to be allowable for at least the reasons claim 110 is allowable. In addition, these claims recite additional features not disclosed or suggested by the combination of Cohn and Archer.

For example, claim 111 recites that the system further includes a single order entry application as one of said plurality of system resources, wherein said order entry application enables a customer to identify and authenticate a plurality of users with distinct toll free call

manager entitlements, and to modify said entitlements from a single point of customer identification and authentication.

The Office Action states that Cohn discloses these features and generally points to Figs. 1-3, 6, 10 and 13 along with col. 4, line 13 to col. 5, line 35; col. 18, lines 23-60; and col. 19, line 18 to col. 20, line 50 (Office Action – page 10). These portions of Cohn have been discussed above. None of these portions of Cohn is at all related to an order entry application, much less an order entry application to enable a customer to identify and authenticate a plurality of users with distinct toll free call manager entitlements, and to modify said entitlements from a single point of customer identification and authentication, as required by claim 111. Archer also does not disclose or suggest these features.

For at least these additional reasons, withdrawal of the rejection and allowance of claim 111 are respectfully requested.

As to claim 115, the Office Action states that Cohn discloses each of the features of claim 115 and generally points to the same portions of Cohn discussed above with respect to claim 97 (i.e., Figs. 1-3, 6, 10 and 13; col. 4, line 13 to col. 5, line 35; col. 18, lines 23-60; and col. 19, line 18 to col. 20, line 50) (Office Action – pages 4-5). The applicants note that the rejection is based on the combination of Cohn and Archer and it is not clear which features the Office Action admits that Cohn does not disclose. The applicants assume that the Office Action admits that Cohn does not disclose that the plurality of system resources include a network manager which manages routing of the customer's traffic over the communications network, and a view application to review network traffic, said network manager and said view application responsive to proxy requests from said dispatch server to enable the customer to command and control switched voice traffic resources and switched data traffic resources provided by the enterprise to the customer, as recited in claim 115,

since the Office Action states that Archer discloses these features. However, clarification is respectfully requested in any subsequent communication. The applicants also point to the arguments submitted in the response filed February 6, 2007 particularly rebutting the alleged teachings of Cohn with respect to the features discussed above. In any event, Cohn does not disclose or suggest these features.

The Office Action states that Archer discloses a network manager and a view application responsive to proxy requests from a dispatch server to enable the customer to command and control switched voice traffic resources and switched data traffic resources (Office Action – page 5).

Similar to the discussion above with respect to claim 97, Archer at col. 4, lines 17-51 discloses using IP to route call notifications to a user's phone system. Archer does not disclose or suggest a network manager which manages routing of the customer's switched voice traffic and switched data traffic over the communications network, and a view application to review network traffic, much less that the network manager and the view application are responsive to proxy requests from said dispatch server to enable the customer to command and control the communications network resources provided by the enterprise to the customer, as required by claim 115.

For at least these reasons, the combination of Cohn and Archer does not disclose or suggest each of the features of claim 115. Accordingly, withdrawal of the rejection and allowance of claim 115 are respectfully requested.

CONCLUSION

In view of the foregoing amendments and remarks, the applicants respectfully request withdrawal of the outstanding rejections and the timely allowance of this application. In addition, as the applicants' remarks with respect to the Examiner's rejection are sufficient to overcome this rejection, the applicants' silence as to assertions by the Examiner in the Office Action or certain requirements that may be applicable to such rejections (e.g., whether a reference constitutes prior art) is not a concession by the applicants that such assertions are accurate or such requirements have been met, and the applicants reserve the right to analyze and dispute such in the future.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

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